

ComEd Community Solar Billing Update, Traditional Community Solar Scoring Update, Notification of Email Phishing Attempts

August 2, 2024

<u>Coming up in Illinois Shines</u> (Program events & due dates found at the <u>Vendor Forums & Key Dates webpage</u>)

- Events
 - No events are scheduled for next week
- Due Dates
 - No deadlines next week

Stakeholder Support

- Program Administrator Office Hours August 7, 2024 from 10:00 11:00 a.m. CPT Individual AV or Designee support for Program requirements, Portal, application, or other questions. Zoom link: https://energy-solution.zoom.us/j/95588710302Co.
- **Application Tips and Tricks** The Program Administrator publishes <u>Tips and Tricks</u> to help support stakeholders in avoiding project applications entering *Need Info* status and delaying their review and approval.
 - Check Site Map against Project Application for Discrepancies
 - Mismatched information between the Site Map and data entered on the project application is a common reason for Need Info requests that can delay application review. To help prevent a request for additional information, the following data points should match before submitting the application. Any differences should be corrected or explained using the Comment section.
 - System size
 - Array and module count and orientation
 - Tracking type

- Mounting location (ground/roof)
- Project address
- Equipment

<u>Program News - New or Updated Items</u> (All Program updates can be found on the <u>Program Updates webpage</u>)

- Community Solar Program News See full TCS and CDCS hubs on Program website.
 - o ComEd CC&B Community Solar Billing UPDATE As many Illinois Shines participants are aware, ComEd has been experiencing significant delays in applying community solar bill credits to customers' accounts. Last week, ComEd provided an update that all outstanding community solar bill credits will be included on customers' bills for July. Many customers will see large amounts of credits added to their account at once; in many cases, the credits may be much more than the customer can use right away. ComEd will allow customers to request "refund checks" for their outstanding community solar credits. This will allow the customer to receive the value of the credits right away, rather than using up the credits over subsequent months. Community solar providers may want to ensure that their customers, especially those who reach out with questions or concerns, are aware of this option. The customer must affirmatively reach out to ComEd to request the refund check.

Please also note that the Consumer Protection Handbook (Section VI.B.2) has specific requirements that apply when a community solar provider bills a customer for multiple billing cycles at once, including offering customers a no-penalty payment plan if the customer is billed for 3 or more billing cycles at once (or 2 or more billing cycles for ILSFA customers). Community solar providers should review these provisions and ensure they are complying with all applicable requirements.



- Traditional Community Solar (TCS) Scoring Update Preliminary scores for all TCS projects submitted during the "first day" application window on June 3, 2024 were shared individually with each AV on July 19, 2024. Please see the current scoring schedule below.
 - Application Review Period: Applications undergo initial review by Program Administrator Approximately 4 weeks (Complete)
 - Application Cure Period: Approved Vendors cure deficiencies identified by Program Administrator – Approximately 2 weeks (Complete)
 - Application Scoring Period: Program Administrator begins scoring process for all relevant applications (those submitted without deficiencies and those that successfully cure deficiencies during the 2-week cure period) – Approximately 3 weeks (Complete)
 - Scoring Cure Period: AVs are offered a chance to review initial score and dispute and resolve any discrepancies – Approximately 2 weeks (currently July 19 - August 2)
 - Scores Published: AVs wishing to appeal their project score will have two weeks from the receipt of scores to submit an appeal to the Program Administrator
 - Random selection event to ordinally rank projects with tied scores
 - Final scores and project selection published
- Minimum Equity Standard (MES) Waiver Score Threshold for AVs/Designees Not Employing Subcontractors The Equity Accountability System requires entities participating in Illinois Shines to meet the Minimum Equity Standard on an annual basis and to demonstrate their compliance. In rare cases, the Agency may grant a waiver from this requirement where the entity demonstrates significant efforts in outreach activities. Entities submitting MES Waiver requests must receive a minimum score of 20 points based on the scoring rubric; for AVs and Designees that do not employ subcontractors for Illinois Shines project work, the minimum required score to qualify for a Waiver is 16 points. This adjustment acknowledges that the waiver criteria regarding direct outreach to Equity Eligible Contractors is not applicable to entities that do not employ subcontractors, thus removing the four points typically awarded for this activity in question 4.d of the scoring rubric.
- Alert: Notification of Email Phishing Attempts Posing as Illinois Shines Program Administrator On July 29, the Program Administrator alerted stakeholders to phishing attempts sent via email last weekend to AVs and Designees. The messages attempted to represent that the sender was from the Program, spoofed the sender address of admin@illinoisshines.com and included the Illinois Shines logo, and urged vendors to take prompt action to "to confirm or update" information (including AV/Designee name, AV/Designee ID, email address, and other information drawn from the publicly available rosters of AVs, Designees, EECs, EEC Designees and EEC Subcontractors) by clicking a link in the email. These emails have not been sent from the Program and are not legitimate requests for information. They should not be responded to, and recipients should not click the links in the message. Phishing emails are fraudulent messages that attempt to deceive recipients into providing sensitive information, or installing malware (such as viruses, worms, adware, or ransomware) by clicking on links or replying to the message. If you clicked the link in the phishing email (or are unsure if you may have) and if you believe you subsequently shared Program portal credentials, please alert the Program Administrator and change your Program portal password immediately. The Program thanks stakeholders for alerting the Program Administrator to these emails, and recommends individual recipients contact their company's system administrators to report the messages.
- New to the Program Website The following key additions to www.lllinoisShines.com have been shared:
 - o Distributed Generation Project Application Checklist (Help Guides and Application Tips page)

<u>Program News - Previously Published Items</u> (All Program updates can be found on the <u>Program Updates webpage</u>)

Changes to Illinois Net Metering Bill Credits - Illinois Shines prioritizes educating and informing customers
about all aspects of their decision to go solar, including the significant financial commitment of solar
installation. This includes Approved Vendors or their Designees providing customers with relevant information
about net metering or other crediting approaches. Historically, Illinois utilities have been required to provide
customer bill credits for excess energy produced by their residential or small commercial solar system at the





full retail rate but under the state's <u>Climate and Equitable Jobs Act</u> ("CEJA"), net metering offerings will change to supply-only starting January 1, 2025. This means that for customers interconnecting renewable energy systems to the grid in ComEd, Ameren, or MidAmerican territories after December 31, 2024, full retail rate net metering will no longer be available. In simplest terms, customers will be credited for excess electricity that their solar project sends to the grid at their electricity supply rate. Though the law sets a deadline of December 31, 2024 for a solar system to be approved for interconnection, installed, and have received permission to operate from the utility, all required documentation must be received by the utility no later than 5 p.m. CPT on December 13, 2024 to be eligible to receive permission to operate by December 31, 2024. The Agency has created a <u>Frequently Asked Questions ("FAQs") document</u> to provide information to AVs/Designees and consumers about the changes. These FAQs can be found in the linked document as well as on the Program's website:

- FAQs Related to Changes in Net Metering in Illinois (AVs and Designees) July 26, 2024 on the Net Metering Credits page and Approved Vendor- and Designee-Facing FAQs on the Vendor FAQs page
- o Consumer-Facing FAQs on the Consumer FAQs page

• Equity Eligible Contractor News – see full EEC hub on Program website

Program Year 2024-25 Mentorship Program - Following the successful Mentorship Pilot Program in Program Year 2023-24, a second cohort of the eight-week training series will be held from January to March 2025. The Mentorship Program is open to EEC AVs and new Approved Vendors that are minority-owned, woman-owned, veteran-owned, disability-owned or considered a small business, and Designees, with the goal to help them learn about Program requirements and application procedures. Registration to participate in the 2024-2025 cohort will begin in November 2024. Please contact the EEC Sector Strategist at eec@illinoisshines.com if you have questions about the Mentorship Program.

General Program

- O Disclosure Form REC Incentive Calculator Adjustments The Illinois Shines Program Portal calculates REC incentive values for Disclosure Forms using applicable REC prices based on the date the Disclosure Form is created. For project applications submitted in the 2024-25 Program Year, which commenced June 3, 2024, Disclosure Forms and contracts should reflect calculations using 2024-25 REC Prices (except in select cases where a Disclosure Form submitted after June 3, 2024, correctly applies PY 2023-24 REC prices, such as a reissued Disclosure Form for a project approved and granted capacity in the previous Program Year). On July 19, 2024, the Program issued an announcement that addressed two issues with the Disclosure Form concerning REC pricing calculation, and corrective actions taken by the Program Administrator and which should be taken by Approved Vendors where necessary. The Program Administrator is available to answer questions and provide assistance to stakeholders in addressing this situation.
- Clarification of "Interconnecting Utility" and "Contracting Utility" The Program Administrator has become aware of some confusion on why projects located in Ameren territory have been contracted to ComEd. The interconnecting utility and the contracting utility may or may not be the same entity. The interconnecting utility is the utility that issues the interconnection agreement and to whose infrastructure the project system is connected. The contracting utility (also known as the Buyer) is the utility that signs the REC Contract and purchases the RECs delivered by the system. There are only three contracting utilities: ComEd, Ameren, and MidAmerican. A project system may be interconnected to Ameren but contracted with ComEd for REC delivery, or vice versa. The Program Administrator determines which utility will serve as the Buyer for each contract. While a batch may contain projects in multiple utility service territories, the Program Administrator will strive to assign contracts to the utility where the bulk of the projects are located but may not always be able to do so because consideration is made to allow each utility to meet its pro-rata share of the Renewable Portfolio Standards ("RPS") REC targets and available RPS funding. The REC price for each system will be based on the applicable Group for that system's physical location, and not based on service area of the contracting utility. A new resource, Contracting Utility Registry Accounts, can be found at the Program **Documents** page in the Other Resources section.



- CEJA Workforce Development News The Office of Governor Pritzker <u>announced</u> the grantees for the CEJA Climate Works Pre-Apprenticeship Program. The Climate Works Pre-Apprenticeship Program provides training opportunities in the trades to expand the clean energy talent pipeline and boost diversity in clean energy trade industries. The program also prioritizes underrepresented populations and residents living in communities that have historically faced economic and environmental barriers. DCEO also awarded several other program administrators for CEJA job training programs and hubs and the <u>list</u> can be found on DCEO's <u>Program Announcements webpage</u>. AVs and Designees seeking to add Equity Eligible Persons to their project workforce may find this resource helpful.
- Annual Reports Next Steps AVs with an active REC Contract are required to submit an Annual Report pertaining to the contracts and systems in their portfolio during the Annual Report period. Annual Reports were due July 15. Submission of an Annual Report is a Program requirement, and failure to submit an Annual Report is an Event of Default under the REC Contract that puts both the Approved Vendor and its contracted projects in jeopardy of continued participation in the Program. The Annual Report Cure Period began on July 16, and the Program Administrator will contact AVs to cure any report discrepancies. Key dates relating to Annual Reports:
 - October 1, 2024 Last day for Program to inform AVs of discrepancies on Annual Reports
 - October 14, 2024 Annual Reports are finalized
 - November 15, 2024 Program Administrator Drawdown calculations complete

Annual Report resources are available to AVs at the Program website's <u>Help Guides and Application</u> <u>Tips and Frequently Asked Questions</u> pages.

- Minimum Equity Standard ("MES") Reminders
 - MES Waiver Microsoft Form The Program has transitioned the MES waiver submission from a PDF template to <u>a fillable Microsoft Form</u> at the <u>Equity Accountability System</u> page. While the content of the waiver has not changed, the Microsoft Form is more efficient for the submitter to complete and assists the Program Administration team with more expedient data collection for review. Supplemental documentation must still be submitted to <u>mes@illinoisshines.com</u>, with the subject line "*Company Name* MES Waiver Request".
 - 2024-25 Program Year MES Compliance Plans Past Due The 2024-25 Program Year MES Compliance Plans were due on June 3, 2024. Any Compliance Plans that have not been submitted ARE OVERDUE and participating entities who did not comply with this Program requirement by June 17 may be subject to disciplinary action. The Program Administrator is currently working to review submitted Compliance Plans. AVs and Designees can expect to be notified of the Pass/Fail result from their Compliance Plan within the next four to six weeks.
 - 2023-24 Program Year MES Year-End Report Past Due As noted in previous announcements, Program Year 2023-24 MES Year-End Reports were due July 15, 2024. Any Year-End Reports that have not been submitted ARE OVERDUE. The online form can be accessed here: https://forms.office.com/r/FM6YbtEFWd. Failure to submit an MES Year-End Report will result in escalation to the Program Administrator's Consumer Protection Team consistent with Sections X.C-D of the Consumer Protection Handbook and may risk future good standing in the Program and result in disciplinary action. Resources on the MES and Equity Accountability System can be found here, https://illinoisshines.com/equity-accountability-system/, and stakeholders may contact the Program Administrator's MES team at mes@illinoisshines.com for assistance.
- Community Solar Program News See full TCS and CDCS hubs on Program website.
 - Community-Driven Community Solar ("CDCS") Part II Demonstration of Project Commitments and Permissible Changes – See <u>previous</u> announcement

Ongoing Operations Updates

 Re-Batching for ICC Meetings – Due to an increase in late requests to withhold projects from submission to the ICC, the Program Administrator would like to remind AVs of the important information below.

In advance of each submission of batches to the ICC for approval, AVs are provided the opportunity to withhold





or re-batch projects. <u>AVs must indicate any requests to withdraw or withhold projects during the two day re-batching window.</u> In the absence of any action by an AV, the Program Administrator will re-batch the projects at their discretion and submit eligible projects to the ICC.

- It is extremely important that AVs review their re-batching files on SharePoint to indicate any re-batching preferences, but especially requests to withhold projects from submission. The Program Administrator alerts AVs by email when they have projects that are eligible for re-batching and planned to be submitted to the ICC in the next memo. Unfortunately, sometimes these communications are missed, and projects are submitted to the ICC despite an AVs intent to hold a project back.
- The Program Administrator requests that AVs who believe they may want to withhold or re-batch projects mark their calendars and review SharePoint folders for re-batching templates. This way, if any email alerts are missed, AVs are still aware of the dates that re-batching opens and can check if any projects are in the upcoming ICC submission. Below are the next re-batching windows:

Re-Batching Opens for AVs	Election Deadline – 12:00 p.m. CPT (Re-batching closes for AVs)	Trade Date (ICC Meeting Date)
8/13/2024	8/15/2024	8/29/2024
8/26/2024	8/28/2024	9/12/2024
9/10/2024	9/12/2024	9/26/2024
9/24/2024	9/26/2024	10/10/2024
9/30/2024	10/2/2024	10/17/2024
10/15/2024	10/17/2024	10/31/2024
10/21/2024	10/23/2024	11/7/2024
11/1/2024	11/6/2024	11/21/2024

<u>Application Processing Updates</u>

Application Processing Update - The Program Administrator continues making substantial progress reviewing waitlist applications since the start of the 2024-25 Program Year. The full queue of previously waitlisted Large DG Part I applications has been processed, and we are exceeding our expectation to process applications within two weeks of batch/paid submittals for the Large DG Part I category. On June 3, the waitlist volume totaled 7,938 Small DG and 208 Large DG applications. Since June 3, over 5,650 Small DG Part I previously waitlisted applications have been reviewed and over 4,940 verified.

Currently the Program Administrator anticipates completing the review of all previously waitlisted DG applications by the beginning of August. The Program continues reviewing applications from an early April period when nearly 1,600 applications were received. Once that very large batch has been processed, more visible application processing progress against previously waitlisted applications, including another large spike submitted just prior to the start of the Program Year, will be evident. The Program Administrator expects to be within a two-week turnaround time for review of applications submitted in the 2024–25 Program Year at the end of September for all application categories. This forecast is subject to change, and updates will be provided in each weekly announcement until processing times are back within a normal range.

Ongoing Program Portal Updates

- The latest Portal updates and enhancements, a Portal Development Roadmap, and portal help guides can be found at https://illinoisshines.com/portal-updates/.
- Portal Maintenance and Releases Scheduled system maintenance windows continue on Tuesday and Thursday evenings (from 8:00 p.m. to 11:00 p.m. CPT), during which times the Portal is typically unavailable to users; the Program hopes these windows are minimally disruptive to Program participants. Users working



in the Portal should save their work prior to the 8:00 p.m. CPT start of system maintenance window, as any unsaved information will be lost when the system is moved into maintenance mode. In some cases, Portal availability may resume earlier than 11:00 p.m. CPT, though AVs and Designees should plan on the full three hours.

Requirements and Reminders

- Stakeholder Feedback There are no current proposals and feedback requests, but forthcoming proposals and feedback requests will be shared here. Details on previous proposals and feedback requests can be found at the Program website.
- IPA Request for AVs and Installer Designees Interested To Serve Stranded Illinois Shines DG Customers As previously <u>announced</u>, the Program seeks entities interested in serving stranded customers, and <u>updates the lists</u> of participating vendors on a rolling basis. The original announcements include details regarding the opportunity to support stranded customers, eligibility requirements, and anticipated responsibilities.

<u>CONTACT US:</u> For portal, application, or Program-specific questions and inquiries, please contact <u>admin@lllinoisShines.com</u> or call 877-783-1820.